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FILED

OCT 15 2024

CLERK, U.S. DISTRICT COURT  
NORTH DISTRICT OF CALIFORNIA

**KAW**

**CV 24-07470**

) Case No.:

1) COMPLAINT

) DEMAND FOR JURY TRIAL

)

)

## I. PARTIES

1. Plaintiff.

**Name:** Shena Hickman

**Address:** 23926 SW 108<sup>th</sup> Place, Homestead, FL 33032

Telephone: (786) 361-5669

## 2. Defendants.

1 Defendant 1:

2 Name: Facebook/Meta

3 Address: 1 Hacker Way, Menlo Park, CA 94025

4 Telephone: (650) 798-7184

5  
6 **II. JURISDICTION**

7 3. My case belongs in federal court

8 ☐ under federal question jurisdiction because it involves a federal law or right. Which  
9 federal law or right is involved?

10 ☒ under diversity jurisdiction because none of the plaintiffs live in the same state as any of  
11 the defendants and the number of damages is more than \$75,000.

12  
13 **III. VENUE**

14 4. Venue is appropriate in this Court because:

15 ☐ a substantial part of the events I am suing about happened in this district.

16 ☒ a substantial part of the property I am suing about is located in this district.

17 ☐ I am suing the U.S. government, federal agency, or federal official in his or her official  
18 capacity and I live in this district.

19 ☐ at least one defendant is located in this District and any other defendants are located in  
20 California.

21  
22 **IV. INTRADISTRICT ASSIGNMENT**

23 1. Because this lawsuit arose in San Mateo County, it should be assigned to the San  
24 Francisco/Oakland Division of this Court.

**V. STATEMENT OF FACTS**

I worked for Defendant as a contractor through PRO Unlimited in their AR/VR Reality Labs marketing advertising group from October 2017 to October 2018 in Menlo Park, California. I ended my contract due to an office incident in which Defendant's team manager, Margaret McLaughlin (former Head of Production, Facebook AR/VR Reality Labs) bullied, cursed, berated and was verbally abusive towards me in the office. She went ballistic on me when I put in a request for additional project staffing needs (a Designer request for Oculus Brand Redesign Project I was the Producer on). I wholeheartedly believe my race (black) was the reason for Margaret McLaughlin's condescending derogatory tone.

During that period from October 1, 2018, through January 2, 2019, I believe I was first retaliated against, by the Defendant's team managers, Josh Higgins (Chief Creative Officer AR/VR Reality Labs), Margaret McLaughlin, and her husband Larry Corwin (ECD on Portal by Facebook, AR/VR Reality Labs) when they used their network with significant resources and influence across the marketing advertising industry to prevent me from getting both freelance assignments and being considered for full time work.

March 20, 2019, the Defendant's team manager, Larry Corwin, and I had an email exchange and he ask if I would reconsider coming back which I said yes. I financially needed the money since I hadn't been consistently working due to their retaliation in blocking me from working. I went back April 7, 2019, through September 11, 2020 (until I had maxed out of my PRO UNLIMITED contractor hours/time). Subsequently, in late September 2020, due to the COVID-19 Pandemic; its impact on photo and film production across the marketing advertising industry; consumer brand supplier chain issues; and a personal injury I expressed interest in a full-time job with Defendant to work in the same group (AR/VR Reality Labs), with the eventual hope, intention of transferring to another marketing production group within the Defendants company. During this period, at the time I received notice of being accepted into the Defendant's Interview Loop Process for a full-time Program Manager position in AR/VR Reality Labs I spoke out against criminal wrongdoing in hiring with a former employee of the Defendant (Holly Butler) and their network within the marketing advertising industry, leading to severe consequences. In retaliation for whistleblowing the Defendant have unleashed their network of KKK Klansman, White Supremacy, Neo Nazi, and the people they control that have a clear disdain for me because of my race (being black). To negate my whistleblower, claim the Defendant's network of KKK Klansman, White Supremacy, Neo Nazi, local police (now Miami-Dade Police since Tuesday, 10/17/2023 temporarily being in Florida), and the people they control have tried everything to destroy my mind, unwittingly make me a drug addict, a convicted criminal in their blatant intent to ruin me.

Daily I'm the victim of their criminal acts of retaliation, death threats, harassment, isolation, bullying, intimidation, abuse (physical, mental, and financial), racist hate, public shunning, public smearing, etc.:

Daily countless attempts at trying to passively expose me to illegal mind-altering street drugs (ingesting and inhaling), against my consent. Criminal assaults if not attempted murder on my life (felony offenses). That even with wearing PPE I have been left physically wounded with bodily injuries including my face chemical burn damaged. This when by personal choice I don't do drugs, I don't smoke, almost never drink, and try to live a clean healthy lifestyle inclusive of working out.

Daily I have been criminally assaulted, physically ambushed by men, lawn care workers, trucks, cars, vans, motorbikes, Miami-Dade County school buses, and Miami-Dade County garbage and recycle trucks intentionally flooding my path with thick pungent gasoline vapors, chemical fumes, exhaust odors, cannabis smoke and smell of soiled garbage almost causing me to collapse even while masked.

Daily being antagonized, bullied by Miami-Dade Police, store security, store employees, people in the neighborhood and owners of large aggressive dogs to incite a negative reaction for a wrongful

1 upon medical diagnosis. The doctor never asked me anything regarding my health, mental health,  
 2 etc. and for point of reference my mother is a retired school teacher. and prior to Tuesday  
 3 10/17/2023 at best I saw my mother [Patricia Hickman-Miller] 1 x a year for the last 26 years. She  
 4 had no firsthand knowledge or insight on my doctors, medical visits, or medical history. 8/15/2024 –  
 5 8/20/2024 at Larkin Behavioral Health Systems, where I was aggressively groped by 2 men and my  
 6 necklace with charm given to intake coordinator at check-in were both missing when discharged.  
 7 8/28/2024 – 9/1/2024 at CHI Doris Ison Behavioral Health where I was told by the doctors my  
 8 detention was to negate my whistleblower claim with saying I suffered from a chemical imbalance.  
 9 With all 3 detentions a clear act of retaliation I was medically diagnosed with conditions  
 10 (schizophrenia, adult major depressive disorder, and a chemical imbalance) I don't inherently suffer  
 11 from and forced against my consent to take medication I naturally don't need, blatant medical  
 12 malpractice. Within 20 minutes of taken the prescribed medications (Aripiprazole, name brand  
 13 Abilify and Risperidone) I experience severe stroke like symptoms (including blurred vision with  
 14 intermittent bouts of blindness, sever migraine, numbness in extremities, rapid heart rate, dry  
 15 heaving, nausea, upset stomach, vomiting, etc.).

16 In retaliation my career is blackballed resulting in me being financially poverty stricken (financial  
 17 abuse). Despite applying to thousands of full-time jobs from April 2021 up until now I have been  
 18 faced with repeated rejections sometimes after multiple rounds of interviews and/or misled to  
 19 believe I would be receiving a full-time job offer then not. I was also met with before, during and  
 20 after interviews an uptick in the criminal acts of retaliation, abuse, and racist hate. I wholeheartedly  
 21 believe that those involved had and still have significant resources across the marketing advertising  
 22 industry, political power, and influence. Since April 2021 I have only gotten freelance project  
 23 assignments but only with the Defendants (former team manager's) network and again have been  
 24 faced with retaliation. I was bullied and harassed. Examples include receiving unreasonable work  
 25 demands late at night, snide and harassing text on weekends, receiving animal feces in the mail at  
 26 my home, getting cryptic text and crank phone calls. Additionally, my work was erased, sabotaged,  
 27 vendor partners blatantly sent work with inaccuracies, and I was falsely accused of erasing others'  
 28 work for client meetings. Since whistleblowing I have applied to over 9,000 jobs and have not been  
 hired for any jobs applicable to my skillset, experience and pay grade.

November of 2022 I was told by civil rights attorney Peter Romer-Friedman the Defendant would be  
 open to hiring me back in either a contractor or full-time capacity in any of their marketing  
 advertising groups. At the time Peter Romer-Friedman had a civil rights class action lawsuit pending  
 against the Defendant that he mentioned as his reason for not being able to personally represent  
 me. He also asked at that time to not file a claim of retaliation for whistleblowing against Defendant  
 with the EEOC. In good faith I believed him, but it was a lie, misleading and simply factually just not  
 true.

I went back to Defendant 4x times pleading for their help in resolving the matter. As well as have  
 sent the Defendant countless follow-up emails. After going back to them each time the retaliation  
 against me got worse, way worse. Thursday, April 1, 2021, Defendant assigned Investigator Ray  
 Wvnter (Received Defendants outcome 4/17/2021 saying they did not find any connection to my  
 whistleblower incident or any issue); Wednesday, June 9, 2021, Defendant assigned Investigator  
 Justin Kochan (Received Defendants outcome 7/15/2021 same, saying they did not find any  
 connection to my whistleblowing incident or see any issue); Wednesday, October 5, 2022,  
 Defendant assigned Investigator Tammv Clark (Received Defendants outcome end of October 2022  
 saying they did not find an issue). I followed up again Monday, December 12, 2022, with Tram Frank  
 and was told the exact same thing.

The Defendant in retaliation for me whistleblowing and because I am a black woman destroyed not  
 just my career but all aspects of my entire life. Did and still doing it with a complete deprivation of  
 my civil and human rights under the color of the law.



**VI. CLAIMS**

**First Claim**

**Name the law or right violated:**

I believe I am being discriminated against because of my race (Black), sex (Female), and age (54) in violation of Title VII of the Civil Rights Act of 1964, as amended.

**Name the defendants who violated it:**

Mark Zuckerberg, Heidi Swartz, Tram Frank, Josh Higgins, Margaret McLaughlin, Larry Corwin, and Holly Butler

**Second Claim**

**Name the law or right violated:**

I believe I am being discriminated against because of my age (54) in violation of the Age Discrimination in Employment Act of 1967, as amended.

**Name the defendants who violated it:**

Mark Zuckerberg, Heidi Swartz, Tram Frank, Josh Higgins, Margaret McLaughlin, Larry Corwin, and Holly Butler

**Third Claim**

**Name the law or right violated:**

I believe I am being discriminated against for engaging in "protected activity" - Whistleblowing.

**Name the defendants who violated it:**

Mark Zuckerberg, Heidi Swartz, Tram Frank, Josh Higgins, Margaret McLaughlin, Larry Corwin, and Holly Butler

**VII. DEMAND FOR RELIEF**

Total monetary amount TBD

As a result of the Defendants retaliation smear campaign, I have endured financial loss, material loss, bodily injuries, stress, mental anguish and a defamation of my name, character, person, and likeness.

- Legal Cease & Desist on the criminal acts of retaliation, abuse (physical, mental, and financial), racist hate, bullying, public shunning, public smearing, harassment, intimidation, and mental health campaign by Defendant's and their network of KKK Klansman, White Supremacy, Neo Nazi, Police (currently Miami-Dade and Homestead Police since 10/17/2023 temporarily being in Florida) and the people they control and have unleashed on me.

- Financially recover all that I have lost as a direct result of retaliation:

-Damages for defamation of name, character, person, and likeness

-Ex-Parte Baker Act removed and expunged

-Damages for blackballed career; and loss of wages 2021 – 2024

-Cost to file bankruptcy; and repair of damaged credit

-Personal security due to daily being victim of criminal acts of retaliation and racist hate crimes

-Repair of face due to damage sustain from passive drug chemical exposure

Replace and/or Reinstatement:

-Dog killed in an act of retaliation

-401K; Cigna PPO health insurance; State Farm insurance (life, burial, and home)

-Cyberattack resulting in broken Apple devices (iPhone Pro Max, and 4x iPods); Beats Pill music speaker; (2) cameras (Leica and Canon)

-Apartment; and (24) pieces of lost Furniture

1 -Car (2020 Land Rover Defender)

2 -(3) pieces of Louis Vuitton luggage; Jennifer Fischer necklace; Rolex watch; (2)  
3 Cartier watches (black and brown leather bands); (2) Chanel bags; Celine designer  
4 bag; (4) Bottega Veneta designer bags; (6) pairs of Bottega Veneta designer shoes;  
5 (6) pairs of designer Sunglasses; designer Clothes; and (6) pairs designer Sneakers

6 -AT&T cellular network and number

7 -Pharmacy regular prescription plan (ie. CVS)

8 - Alpha Kappa Alpha membership

9 -AARP membership

10 -Travel Global Entry

11 -Monthly subscriptions: Netflix, HBO Max, Hulu, Vogue magazine, Elle magazine,  
12 Harper's Bazaar magazine, Marie Claire magazine and Sirius radio

13 -Wix website, cost to redesign + domain; LinkedIn Premium; Hotmail Premium;  
14 Gmail additional storage

15  
16 **VIII. DEMAND FOR JURY TRIAL**

17 ■ Plaintiff demands a jury trial on all issues.

18  
19  
20  
21 DATED: October 11, 2024

Respectfully submitted,

Shena Hickman

Your signature

Shena Hickman



STATE OF CALIFORNIA | Business, Consumer Services and Housing Agency

GAVIN NEWSOM, GOVERNOR

## Civil Rights Department

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758  
800-884-1684 (voice) | 800-700-2320 (TTY) | California's Relay Service at 711  
www.calcivilrights.ca.gov | contact.center@dfeh.ca.gov

KEVIN KISH, DIRECTOR

EEOC Number: 550-2024-01235  
Case Name: Ms. Shena Hickman v. Facebook / Meta  
Filing Date: March 1, 2024

### NOTICE TO COMPLAINANT AND RESPONDENT

This is to advise you that the above-referenced complaint is being dual filed with the California Civil Rights Department (CRD) by the U.S. Equal Employment Opportunity Commission (EEOC). The complaint will be filed in accordance with California Government Code section 12960. This notice constitutes service pursuant to Government Code section 12962.

The EEOC is responsible for the processing of this complaint. Please contact EEOC directly for any discussion of this complaint or the investigation.

### NOTICE TO COMPLAINANT OF RIGHT TO SUE

This letter is also your Right to Sue notice. **This Right to Sue Notice allows you to file a private lawsuit in State court.** According to Government Code section 12965, subdivision (c), you may bring a civil action under the provisions of the Fair Employment and Housing Act against the person, employer, labor organization or employment agency named in the above-referenced complaint. The lawsuit may be filed in a State of California Superior Court. Government Code section 12965, subdivision (c), provides that such a civil action must be brought within one year from the date of this notice. Pursuant to Government Code section 12965, subdivision (e)(1), this one-year period will be tolled during the pendency of the EEOC's investigation of your complaint. You should consult an attorney to determine with accuracy the date by which a civil action must be filed. This right to file a civil action may be waived in the event a settlement agreement is signed.

Be advised, CRD does not retain case records beyond three years after a complaint is filed.





## U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

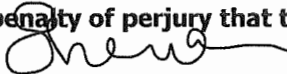
## CHARGE OF DISCRIMINATION

EEOC Form 5A (October 2017)

For Official Use Only – Charge Number:

550-2024-01235

<b>Personal Information</b>	<p>Shena Hickman</p> <p>First Name: _____ MI: _____ Last Name: _____</p> <p>23926 SW 108th Place</p> <p>Address: _____ Apt.: _____</p> <p>Homestead FL 33032</p> <p>City: _____ County: _____ State: _____ Zip Code: _____</p> <p>917-568-6471</p> <p>Phone: _____ Home <input type="checkbox"/> Work <input type="checkbox"/> Cell <input checked="" type="checkbox"/> Email: <a href="mailto:shenahickman@gmail.com">shenahickman@gmail.com</a></p>
<b>Who do you think discriminated against you?</b>	<p>Employer <input checked="" type="checkbox"/> Union <input type="checkbox"/> Employment Agency <input type="checkbox"/> Other Organization <input type="checkbox"/></p> <p>Facebook/Meta</p> <p>Organization Name: _____</p> <p>1 Hacker Way</p> <p>Address: _____ Suite: _____</p> <p>Menlo Park CA 94025 650-798-7184</p> <p>City: _____ State: _____ Zip Code: _____ Phone: _____</p>
<b>Why you think you were discriminated against?</b>	<p>Race <input checked="" type="checkbox"/> Color <input checked="" type="checkbox"/> Religion <input type="checkbox"/> Sex <input checked="" type="checkbox"/> National Origin <input type="checkbox"/> Age <input checked="" type="checkbox"/></p> <p>Disability <input type="checkbox"/> Genetic Information <input checked="" type="checkbox"/> Retaliation <input type="checkbox"/> Other <input checked="" type="checkbox"/> (specify) Whistleblowing</p>
<b>What happened to you that you think was discriminatory?</b>	<p>02/19/2024</p> <p><b>Date of most recent job action you think was discriminatory:</b> _____ <b>Also describe briefly each job action you think was discriminatory and when it happened (estimate).</b> Since three years ago when I spoke out against a potential criminal wrongdoing in hiring with former Facebook/Meta employees and their network within the marketing advertising industry, I have faced severe consequences including economic loss, career blackballed, death threats, harassment, isolation, bullying, shunning, public smear campaign (inclusive of racial and criminal profiling), invasion of privacy and character defamation with a manufactured false mental health campaign meant to prevent me from working in Corporate America again. Despite applying to thousands of full-time jobs from April 2021 up until now in retaliation I have faced repeated abusive acts (mentally and physically) before, and during the interview process. As well as repeated rejections sometimes after multiple rounds of interviews and/or misled to believe I would be receiving a full-time job offer then not. The retaliatory acts/attacks have been inhumane, barbaric, sinister, and racial in nature. A total violation of my civil and human rights. Offensive actions meant to have a negative impact on my five senses for an adverse effect on my brain, mind, and memory. To batter and wound me also physically.</p>

	Text
<b>Signature and Verification</b>	<p>I understand this charge will be filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address, phone, or email. I will cooperate fully with them in the processing of my charge in accordance with their procedures.</p> <p>I understand by signing below that I am filing a charge of employment discrimination with the EEOC. I understand that the EEOC is required by law to give a copy of the charge, which includes my allegations and my name, to the organization named above. I also understand that the EEOC can only investigate charges of job discrimination based on race, color, religion, sex, national origin, age, disability, genetic information, or based on retaliation for filing a charge of job discrimination, participating in an investigation of a job discrimination complaint, or opposing job discrimination. <b>I declare under penalty of perjury that the above is true and correct.</b></p> <p style="text-align: right;">03/01/2024</p> <p>Signature:  Date: _____</p>

**PRIVACY ACT STATEMENT:** Under the Privacy Act of 1974, Pub. Law 93-579, authority to request personal data and its uses are:

- 1. FORM NUMBER/TITLE/DATE.** EEOCForm5A, Charge of Discrimination, Issued October 2017.
- 2. AUTHORITY.** 42 U.S.C. 2000e-5(b), 29 U.S.C. 211, 29 U.S.C. 626, 42 U.S.C. 12117, 42 U.S.C. 2000ff-6.
- 3. PRINCIPAL PURPOSES.** The purposes of a charge, taken on this form or otherwise reduced to writing (whether later recorded on this form or not) are, as applicable under the EEOC anti-discrimination statutes (EEOC statutes), to preserve private suit rights under the EEOC statutes, to invoke the EEOC's jurisdiction and, where dual-filing or referral arrangements exist, to begin state or local proceedings.
- 4. ROUTINE USES.** This form is used to provide facts that may establish the existence of matters covered by the EEOC statutes (and as applicable, other federal, state or local laws). Information given will be used by staff to guide its mediation and investigation efforts and, as applicable, to determine, conciliate and litigate claims of unlawful discrimination. This form may be presented to or disclosed to other federal, state or local agencies as appropriate or necessary in carrying out EEOC's functions. A copy of this charge will ordinarily be sent to the respondent organization against which the charge is made.
- 5. WHETHER DISCLOSURE IS MANDATORY; EFFECT OF NOT GIVING INFORMATION.** Charges must be reduced to writing and should identify the charging party and respondent and the actions or policies complained of. Without a written charge, EEOC will ordinarily not act on the complaint. Charges under Title VII, ADA or GINA must be sworn to or affirmed (either by using this form or by presenting a

notarized statement or unsworn declaration under penalty of perjury); charges under the ADEA should ordinarily be signed. Charges may be clarified or amplified later by amendment. It is not mandatory that this form be used to make a charge.

### **NOTICE OF RIGHT TO REQUEST SUBSTANTIAL WEIGHT REVIEW**

Charges filed at a state or local Fair Employment Practices Agency (FEPA) that dual-files charges with EEOC will ordinarily be handled first by the FEPA. Some charges filed at EEOC may also be first handled by a FEPA under worksharing agreements. You will be told which agency will handle your charge. When the FEPA is the first to handle the charge, it will notify you of its final resolution of the matter. Then, if you wish EEOC to give Substantial Weight Review to the FEPA's final findings, you must ask us in writing to do so within 15 days of your receipt of its findings. Otherwise, we will ordinarily adopt the FEPA's finding and close our file on the charge.

### **NOTICE OF NON-RETALIATION REQUIREMENTS**

Please **notify** EEOC or the state or local agency where you filed your charge **if retaliation is taken against you or others** who oppose discrimination or cooperate in any investigation or lawsuit concerning this charge. Under Section 704(a) of Title VII, Section 4(d) of the ADEA, Section 503(a) of the ADA and Section 207(f) of GINA, it is unlawful for an <sup>employer</sup> to discriminate against present or former employees or job applicants, for an <sup>employment agency</sup> to discriminate against its members or membership applicants, because they have opposed any practice made unlawful by the statutes, or because they have made a charge, testified, assisted, or participated in any manner in an investigation, proceeding, or hearing under the laws. The Equal Pay Act has similar provisions and Section 503(b) of the ADA prohibits coercion, intimidation, threats or interference with anyone for exercising or enjoying, or aiding or encouraging others in their exercise or enjoyment of rights under the Act.



STATE OF CALIFORNIA | Business, Consumer Services and Housing Agency

GAVIN NEWSOM, GOVERNOR

## Civil Rights Department

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758  
800-884-1684 (voice) | 800-700-2320 (TTY) | California's Relay Service at 711  
www.calcivilrights.ca.gov | contact.center@dfeh.ca.gov

KEVIN KISH, DIRECTOR

EEOC Number: 550-2024-00201  
Case Name: Ms. Shena Hickman v. Facebook  
Filing Date: November 7, 2023

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